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July 26, 2011

By ECF

Hon. Edward R. Korman  
United States District Court  
Eastern District of New York  
U.S. Courthouse, Room 918  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *United States v. Khouli, et al., (Salem Alshdaifat)* 11 Cr. 340 (ERK)**

Dear Judge Korman:

I write on behalf of defendant Salem Alshdaifat in the above-referenced case to request a bail modification on consent.

Mr. Alshdaifat's bail was set by Judge Gleeson in this District on July 19, 2011. There were a number of bail conditions imposed on Mr. Alshdaifat including home detention and electronic monitoring. Additional bail conditions were entered pursuant to a stipulation by the parties and filed in the Eastern District of Michigan, where Mr. Alshdaifat was arrested and where he currently resides. *See United States v. Alshdaifat*, 11-mj-30365 (JU) (E.D. Mich. July 19, 2011) (Doc. No. 14). One of these conditions governed Mr. Alshdaifat's travel for legal visits and court appearances, stating:

The United States of America and the Defendant SALEM ALSHDAIFAT agree that Defendant will surrender all personal driver's licenses to the Pretrial Services Agency. Defendant's personal driver's licenses shall be held by the Pretrial Services Agency and will be provided to Defendant for purposes of approved travel to and from the Eastern District of Michigan and the Southern and Eastern Districts of New York.

(*Id.*) It is this condition that Mr. Alshdaifat now seeks to modify.

Mr. Alshdaifat's Michigan driver's license was seized by the government at the time of his arrest. However, the jail where Mr. Alshdaifat was initially detained apparently has misplaced the license and cannot locate it. Mr. Alshdaifat has no other driver's licenses in his



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possession. Accordingly, in order to travel to meet with me to prepare his case and for all court appearances, Mr. Alshdaifat needs an alternative photo identification card with which to travel.

I have consulted with Assistant United States Attorney Karin Orenstein on this issue, and on behalf of the government, she has no objection to modifying the above bail condition to include the following:

Due to the fact that Mr. Alshdaifat's personal driver's license cannot be located, the parties agree that defendant's permanent resident identification card (or "green card") issued by the United States Citizenship and Immigration Services be substituted for his personal driver's license and be held by his supervising Pretrial Services Officer in the Eastern District of Michigan. Accordingly, the United States Immigration and Customs Enforcement agency, which currently possesses Mr. Alshdaifat's permanent resident card, shall produce such card to the Pretrial Services Agency in the Eastern District of Michigan. This card shall then be returned to Mr. Alshdaifat for purposes of approved travel to and from the Eastern District of Michigan and the Southern and Eastern Districts of New York.

Also, the government has consented to allowing Mr. Alshdaifat to travel to the offices of the Michigan Secretary of State to apply for a replacement to his misplaced Michigan state driver's license. Because the government has seized all of Mr. Alshdaifat's identification documents, it should return to him any of those documents needed for Mr. Alshdaifat to complete an application for a replacement driver's license. These arrangements can be facilitated by the Pretrial Services Agency in the Eastern District of Michigan.

Finally, Mr. Alshdaifat will provide all travel and contact information to both Pretrial Service Agencies in the Eastern Districts of Michigan and New York when he travels for legal visits and Court appearances.



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Thank you for your consideration of this matter.

Respectfully yours,

A handwritten signature in black ink, appearing to read 'Henry E. Mazurek', with a stylized flourish at the end.

Henry E. Mazurek

cc: A.U.S.A. Karin Orenstein  
U.S. Pretrial Services Officer Linda Anderson (E.D. Mich.)  
U.S. Pretrial Services Officer Homero Hinojosa (E.D. Mich.)  
U.S. Pretrial Services Officer Patrick Mancini (E.D.N.Y.)